

THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

FEDERAL TRADE COMMISSION, *et al.*,

Plaintiffs,

v.

AMAZON.COM, INC., a corporation,

Defendant.

CASE NO.: 2:23-cv-01495-JHC

**STIPULATED MOTION AND
[PROPOSED] ORDER TO SEAL
PORTIONS OF THE SECOND
AMENDED COMPLAINT**

NOTE ON MOTION CALENDAR:
October 31, 2024

The parties, by and through their attorneys of record, respectfully request that the Court enter the proposed order set forth below, sealing portions of Plaintiffs' Second Amended Complaint.

In support of this request, the parties represent the following to the Court:

1. On September 30, 2024, the Court issued an Order on Defendant's Motion to Dismiss & Plaintiffs' Motion to Bifurcate (Dkt. #289), which granted Plaintiffs until October 31, 2024, leave to file a Second Amended Complaint as to any claims dismissed without prejudice.

2. Pursuant to that Order, Plaintiffs are filing a Second Amended Complaint that amends claims under the state laws of Maryland, Pennsylvania, and New Jersey. The only substantive changes to the Second Amended Complaint relate to these state law claims.
3. The Court previously entered three orders sealing portions of the Complaint. Dkts. #108, 120, 172.
4. The Second Amended Complaint includes information the Court previously ordered to be sealed. Dkts. #108, 120, 172. That information is highlighted in the Second Amended Complaint.
5. Plaintiffs are filing a public version of the Second Amended Complaint redacting only the information the Court previously ordered to be sealed. Dkts. #108, 120, 172.
6. Pursuant to Local Civil Rule 5(g)(3)(A), the undersigned counsel certify that they met and conferred to reach the agreement described in this Stipulated Motion. The following attorneys conferred by email on October 29, 2024 and October 31, 2024: Edward Takashima, Kara King, and Michael Baker for the FTC; Michael Jo for the State of New York; Tim Smith for the State of Oregon; Rahul Darwar and Victoria Field for the State of Connecticut; and Kristen DeWilde, Katherine Trefz, Robert Keeling, Katharine Mitchell-Tombras, Molly Terwilliger, and CJ Pruski for Amazon.
7. The parties stipulate as follows, subject to Court approval, and jointly request that the Court enter the following Order approving this Stipulation:
 - a. The highlighted portions of the Second Amended Complaint shall be sealed.

1 Stipulated to and respectfully submitted this 31st day of October, 2024, by:

2 s/ Kara King

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Attorneys for Defendant Amazon.com, Inc.

[PROPOSED] ORDER

IT IS SO ORDERED.

DATED this _____ day of _____, 2024.

JOHN H. CHUN
UNITED STATES DISTRICT JUDGE

Presented By:

s/ Kara King

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